

Request for Appeal SDNY case# 1:25-cv-04004

July 17, 2025

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Delivered via email to all parties and Pro Se Intake: ([ProSe@nysd.uscourts.gov](mailto:ProSe@nysd.uscourts.gov)) and NYSCEF

District Judge Honorable Jesse Furman  
Southern District of New York  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

Application DENIED as frivolous. The Court's remand order is almost certainly not appealable, see 28 U.S.C. § 1447(d), and, if it was appealable, almost certainly too late to appeal, see Fed. R. App. P. 4(a)(1). And the Court has not yet entered a final order with respect to the award of fees to Defendant. As a courtesy, Plaintiff is granted an extension of time until July 28, 2025, to file any opposition to Defendant's fee request. See ECF Nos. 31-32. The Clerk of Court is directed to mail a copy of this endorsed letter to Plaintiff. SO ORDERED

**Re: Request for Appeal 1:25-cv-04004**

Dear Honorable Judge Furman,



July 21, 2025

Unfortunately, I am left again to be without counsel in a highly litigious circumstance. Much of the delays and lack of compliance of filings on time was due to Mr. Benjamin Rajotte valiant pursuits to help me in all of these cases simultaneously (as a sole practitioner working for me Pro Bono) but he has decided to withdraw. I am attaching the letter that I sent to NYS Court this evening as it illustrates the details on this matter.

With regards to Your Honor's Order, I respectfully request the opportunity to have counsel properly brief this Appeal. I do not have new counsel at this time. There is a contractual insurance policy for defense coverage that has not been compliant to date (it funded my legal defense before the opposition decided to sue the carrier to cause these type of conundrums) but I have reached out again to make the request to cover the many legal manners, including this one.

In the interim, it is my understanding that much of the reply to this very Appeal, may be considered by reviewing the Appeal brief filed on July 1<sup>st</sup>, 2025, in front of Judge Vargas, case 1:24-cv-08649. There was a request made by me to consolidate these related cases earlier this summer, for the hope of judicial efficiency. This appeal process is still in the process of both sides providing briefs and replies. I hereby request that Your Honor consider allowing me ample time to make a demand on my insurance carrier to provide counsel to properly brief this issue, but it is also possible that the result of the BK appeal, may deem this related issue moot.

Thank you and respectfully submitted.

Jeffrey Simpson /s/